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**Sent:** 6/17/2019 11:58:09 PM  
**To:** Wu, Jennifer [Wu.Jennifer@epa.gov]; Poulsom, Susan [Poulsom.Susan@epa.gov]  
**Subject:** RE: Draft Follow up message to Corps

Thanks for pointing me in the right direction in your separate emails Jenny. Form 2E doesn't address

Form 2C states "When an applicant has two or more outfalls with substantially identical effluents, the NPDES permitting authority may allow the applicant to test only one outfall and report those quantitative data as applying to the substantially identical outfall. If the permitting authority grants your request, attach a separate sheet to the application form identifying the outfall tested and describing why the other outfall(s) are substantially identical."

Martin Merz  
Physical Scientist – EPA Region 10  
[merz.martin@epa.gov](mailto:merz.martin@epa.gov)  
206-553-0205

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**From:** Wu, Jennifer  
**Sent:** Monday, June 17, 2019 8:43 AM  
**To:** Merz, Martin <[merz.martin@epa.gov](mailto:merz.martin@epa.gov)>; Poulsom, Susan <[Poulsom.Susan@epa.gov](mailto:Poulsom.Susan@epa.gov)>  
**Subject:** RE: Draft Follow up message to Corps

Martin, the Lower Columbia and Snake River dam permits include "maintenance-related waters" that could cover the parking lot. I envisioned maintenance-related waters feeding into drainage sumps then being discharged as opposed to the Chief Joe situation where there are drains leading out to a trib to the Columbia. But the approach that you talk about that this specific outfall is different from the rest so has its own table and explanation in the FS makes sense.

Jenny Wu  
Environmental Engineer, NPDES Permits Section  
EPA Region 10  
1200 6<sup>th</sup> Avenue, Suite 155 (19-CO4)  
Seattle, WA 98101  
206-553-6328

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**From:** Merz, Martin  
**Sent:** Friday, June 14, 2019 11:23 AM  
**To:** Wu, Jennifer <[Wu.Jennifer@epa.gov](mailto:Wu.Jennifer@epa.gov)>; Poulsom, Susan <[Poulsom.Susan@epa.gov](mailto:Poulsom.Susan@epa.gov)>  
**Subject:** RE: Draft Follow up message to Corps

Thanks All!

I'll review form 2E and work with Marshall on the other questions. I'll attach the form and refrain from saying that we 'are ok with' anything, and just work through these w Marshall in the context of the application forms.

Ex. 5 Deliberative Process (DP)	Margaret said that it would probably	Ex. 5 Deliberative Process (DP)
<b>Ex. 5 Deliberative Process (DP)</b>		
Ex. 5 Deliberative Process (DP)		

I'll reword the email per your feedback and get it back to you all for quick review, would be good to send out today. See email with links from Margaret pasted below.

Best,

Martin Merz  
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Margaret email w links:

So check out Part 8, P

**Part 8 – Sector-Specific Requirements for Industrial Activity**

**Subpart P – Sector P – Land Transportation and Warehousing.**

[https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_part8.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_part8.pdf)

The rest of the permit and language is here: <https://www.epa.gov/npdes/final-2015-msgp-documents>

“fact sheet for Sector P” [https://www.epa.gov/sites/production/files/2015-10/documents/sector\\_p\\_transportationfacilities.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/sector_p_transportationfacilities.pdf)

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**From:** Wu, Jennifer

**Sent:** Friday, June 14, 2019 9:02 AM

**To:** Poulsom, Susan <[Poulsom.Susan@epa.gov](mailto:Poulsom.Susan@epa.gov)>; Merz, Martin <[merz.martin@epa.gov](mailto:merz.martin@epa.gov)>

**Subject:** RE: Draft Follow up message to Corps

The other dams filled out Forms 1 and 2E. I'll also check my emails on what Courtney said about

Ex. 5 Deliberative Process (DP)

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**From:** Poulsom, Susan

**Sent:** Thursday, June 13, 2019 3:48 PM

**To:** Wu, Jennifer <[Wu.Jennifer@epa.gov](mailto:Wu.Jennifer@epa.gov)>; Merz, Martin <[merz.martin@epa.gov](mailto:merz.martin@epa.gov)>

**Subject:** RE: Draft Follow up message to Corps

Hi Martin – thanks for pulling this together.

We will want to send them a link to the new application:

<https://www.epa.gov/npdes/npdes-applications-and-forms>

These became effective on June 12, 2019.

Jenny – Did Dru have facilities submit form 2C or 2E?

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- NPDES Application Form 2C: Existing Manufacturing, Commercial, Mining, and Silvicultural Operations – Complete this form and Form 1 if your facility is an existing manufacturing, commercial, mining, or silvicultural facility that currently discharges process wastewater.
- NPDES Application Form 2D: New Manufacturing, Commercial, Mining, and Silvicultural Operations That Have Not Yet Commenced Discharge of Process Wastewater – Complete this form and Form 1 if your facility is a new manufacturing, commercial, mining, or silvicultural facility that has yet to commence discharge of process wastewater.
- NPDES Application Form 2E: Manufacturing, Commercial, Mining, and Silvicultural Facilities Which Discharge Only Nonprocess Wastewater – Complete this form and Form 1 if your facility is a new or existing manufacturing, commercial, mining, and silvicultural facility that discharges only nonprocess wastewater.

On the specific question

## Ex. 5 Deliberative Process (DP)

Check with Margaret McCauley about whether they have coverage under the MSGP. I think that Ex. 5 Deliberative Process (DP)  
Ex. 5 Deliberative Process (DP)

On the other four issues - please review the application requirements and get familiar with the requirements. I don't want to say "we are OK with..." We need to instead refer them back to the application requirements.

The application has specificity on:

- Representative samples
- Accuracy requirements for temp

After you have a chance to review the application requirements, lets discuss. Some of these decisions/conclusions are for the permittee to make.

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**From:** Wu, Jennifer

**Sent:** Wednesday, June 12, 2019 12:03 PM

**To:** Merz, Martin <merz.martin@epa.gov>; Poulson, Susan <Poulson.Susan@epa.gov>

**Subject:** RE: Draft Follow up message to Corps

Hey Martin and Susan, it was great traveling with both of you and learning more about the Chief Joe (oh yeah!) Dam. Martin, your email looks good. Here's the link to the temp device specs. As we talked about, I'd include a link to the newest permit application and also examples of the flow diagrams you thought were useful in other permits. More to come on Ex. 5 Deliberative Process (DP)

- a) Temperature data must be recorded using a micro-recording device known as thermistors or a device that is consistent with Washington Department of Ecology's 2003 publication, *Continuous Temperature Sampling Protocols for the Environmental Monitoring and Trends Section* (03-03-052). Set the device to record at one-hour intervals. Report the following temperature

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**From:** Merz, Martin

**Sent:** Wednesday, June 12, 2019 10:54 AM

**To:** Poulsom, Susan <Poulsom.Susan@epa.gov>; Wu, Jennifer <Wu.Jennifer@epa.gov>

**Subject:** Draft Follow up message to Corps

Hi Jenny and Susan,

I drafted a message to the Corps. I highlighted outstanding questions we need discuss, and would love your sign off on the conclusions we came to before sending. Should I set up a meeting with all of us and Courtney to discuss the

**Ex. 5 Deliberative Process (DP)**

Please see draft message below:

Hi Marshall,

A huge thank you to you, Harland, Scott, James and Rick for taking so much time to show us around and provide so much invaluable information and context on Tuesday. It was really helpful and enjoyable for Susan, Jenny and I, and I hope it helped clarify the application process for you all. This message is meant to recap our visit and outline my understanding of the conclusions we came to on the questions that were raised, and to have a shared understanding of follow up items.

**Conclusions:**

1. **Ex. 5 Deliberative Process (DP)**
1. **Regarding the situation where two pumps are pulling from one sump, and only one of the pumps is reasonably accessible:** We are ok with you sampling the accessible outfall - please document specifically how/why the discharge water from the one pump will be representative of the other.
2. **Regarding the situation where the outfall itself is inaccessible, but the two separate cooling water pipes leading to the outfall are accessible:** We are ok with you sampling each of the two source pipes to represent the outfall discharge water. Please specifically document the relative and overall flows of each source pipe.
3. **Temperature monitoring equipment:** See the attached Ecology language (I poked around but can't find what you were eluding to) regarding temperature monitoring accuracy
4. **Ex. 5 Deliberative Process (DP)**
5. **Application to EPA:** Brian Wilson shared that the Corps will likely be held to an internal, litigation driven deadline of May 2020 to submit complete application. [Note – we should share this timing info with Dan etc. and update permit tracker etc]

**Follow-Ups:**

1. **PCB's:** Marshall will send me PCB monitoring results to inform the permit writing documentation process. Once he has results from his follow up sampling on the transformer in question he will get those to me as well.
2. **Representative sampling of identical outfalls:** Martin will make sure Marshall has the updated permit application, and the two of them will coordinate on understanding provisions and documentation for representative sampling regarding Units 1-16 and Units 17-27 (except 18+26).
3. **Parameters:** Martin and Marshall will give a close read to application and coordinate on which parameters make sense to sample for at any given outfalls.
4. **Biological Assessment (BA):** Marshall will follow up with Martin with the Biological Evaluation/Assessment (BE/BA) that was conducted regarding the construction of a boathouse. This report can be accessed from the Natural Resources or Fisheries group at the Corps in Seattle.

Looking forward to working with you all!

Best,

Martin Merz

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